

WORK ASSIGNMENT REQUEST
WA NO: 2-03

WORK ASSIGNMENT TITLE

Technical and regulatory support in the possible development of a rulemaking to modify NESHAPs Subpart W, the national emissions standards for radon emissions from operating mill tailings (40 CFR 61.250).

WORK ASSIGNMENT MANAGER

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CONTRACTOR: S. Cohen and Associates

LEVEL OF EFFORT

Hours: 350

Completion Date: Date of Contracting Officer approval through January 26, 2012

BACKGROUND

The Office of Radiation and Indoor Air (ORIA) promulgated a National Emission Standard for a Hazardous Air Pollutant (NESHAP) for radon emissions from operating uranium mill tailings impoundments (Subpart W) on 12/15/1989. Subpart W includes two separate standards. First, existing sources must ensure emissions from tailings impoundments not exceed 20 pCi/m²-sec of radon-222. Second, new sources must comply with the requirements for constructing one of two types of impoundment structures. Subpart W requires that existing sources file an annual report of the facility's emissions. Section 112(q) of the Clean Air Act, as amended (CAAA) requires EPA to review, and if appropriate, revise, this standard on a timely basis (10 year interval). The Agency has not reviewed this standard in the period allotted and now desires to do so.

PURPOSE

The purpose of this work assignment is to obtain follow-on contractor support to address development of a draft Background Information Document, and to receive support for the development of a response to comments document. It is important to note that this rulemaking is now on an accelerated time schedule, and the contractor will be tasked as such.

SCOPE OF WORK

In meeting the requirements of this work assignment, the contractor shall be in a support role, and will not be involved in the development of EPA policy, nor in any other activity that is an “inherently governmental function.”

Task 1: Prepare work plan and cost proposal. The contractor shall submit a work plan that details the contractor's approach for accomplishing the Work Assignment, including a schedule of deliverables, staffing plan (with statements of experience), estimated labor hours and a detailed cost proposal, with relevant ODCs, on a task by task basis.

Task 2: Prepare Quality Assurance Program Plan

1. The contractor's QA Manager shall prepare a brief Quality Assurance Project Plan (QAPP) that describes how the contractor's QA manager shall verify that the qualifications and independence of the staff performing the work on this work assignment are sufficient.

The QAPP must be approved by the Contractor's QA Manager before any work can begin on task 3. The QAPP must be approved by the EPA WAM and EPA QA Coordinator. The contractor shall reference EPA's “QA/G-4, Guidance for Data Quality Objectives Process” for Data Quality Objectives (DQOs) and QA/R-5, “EPA Requirement for Quality Assurance Project Plans for Environmental Data Operations” for a QAPP.

Task 3: Prepare draft chapters for Background Information Document that supports a proposed rule making decision for NESHAP Subpart W.

The contractor, using the comprehensive outline and introductory chapter produced in a previous work assignment, shall prepare the draft Background Information Document. Some topics that need to be addressed in the document include; Characterization of the problem being addressed, data and scientific analyses needed to make the decision, historical background, risk assessment, among others. The contractor shall meet with the WAM and shall obtain the approval for the chapters and contents prior to beginning the work on each chapter. The Contractor shall submit draft chapters to the WAM on a schedule included in the Contractor's work plan, and agreed to by the WAM. The WAM shall have 14 days to review and submit comments to the Contractor, and the Contractor shall process those changes and resubmit the final draft chapters with 7 days. The WAM will schedule bi-weekly conference call with the Contractor to ensure timely resolution of potential issues, and to ensure that the project remains on schedule.

SCHEDULE AND DELIVERABLES

<u>TASK NO:</u>	<u>DELIVERABLE</u>	<u>DUE DATE</u>
Task 1:	Work Plan	Within 10 days after receipt of Work Assignment
Task 2:	QAPP	Within 30 days after work plan approval
Task 3:	Draft chapters of the Background Information Document	As approved by the WAM from the Work Plan submitted by the Contractor

The contractor shall provide two hard copies of all deliverables and an IBM PC compatible compact disk (CD) copy in Microsoft Word 2007 to the Work Assignment Manager.

The Work Assignment Manager (WAM) is authorized to provide technical direction which clarifies the statement of work as set forth in this work assignment. Technical direction will be issued in writing or confirmed in writing, by the WAM, within five (5) calendar days after verbal issuance.

The WAM will forward a copy of the technical direction memorandum to the Contracting Officer and a copy to the Project Officer. Technical direction must be within the contract **and** the work assignment statement of work. Technical direction includes (1) direction to the contractor which assists the contractor in accomplishing the Statement of Work and (2) comments on and approval of reports and other deliverables.